

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

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ODL, INCORPORATED,

Plaintiff,

Case No.

v.

Hon.

CREATE-A-DOOR, LLC,

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

Defendant.

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Plaintiff complains against defendant as follows:

1. This is an action for copyright infringement under Title 17 of the United States Code.

2. The Court has jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). Plaintiff is a Michigan corporation that has its principal place of business in Zeeland, Michigan. Defendant is a Pennsylvania limited liability company whose members are residents of Pennsylvania.

3. Venue is proper under 28 U.S.C. § 1400, because defendant may be found in this judicial district.

4. Plaintiff is engaged in the business of, among other things, the design and sale of decorative doorglass.

5. Plaintiff is the owner of the five duly issued copyright registrations attached as composite Exhibit A for copyrights to decorative doorglass.

6. Defendant has infringed plaintiff's copyrights by manufacturing, distributing, selling or offering for sale products that incorporate the copyrighted works and by copying the works without authorization from plaintiff.

7. Defendant's infringement was done with knowledge of the copyrights and is willful.

WHEREFORE, plaintiff requests that the Court enter judgment against defendant:

- (a) Enjoining defendant from infringing plaintiff's copyrights;
- (b) Awarding plaintiff damages and the additional profits of defendant;
- (c) Seizing for destruction the products that incorporate the copyrighted works;

- (d) Awarding plaintiff its costs and attorney fees; and
- (e) Granting plaintiff all additional relief to which it is entitled.

Dated: January 20, 2009

WARNER NORCROSS & JUDD LLP

/s/ James Moskal

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